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6 Attorneys for Defendants
Biomet Orthopedics, LLC, Biomet, Inc., and
7 Biomet, LLC

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 DELORES CLARK,

11 Plaintiffs,

12 vs.

13 BIOMET ORTHOPEDICS, LLC, BIOMET,
14 INC., and BIOMET, LLC,

15 Defendants.
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No.: 12-CV-3740-SI

**~~PROPOSED~~ STIPULATED ORDER TO
TRANSFER VENUE**

Honorable Susan Illston

12-CV-3740-SI

Pursuant to 28 U.S.C. § 1404(a) Plaintiff Delores Clark (“Plaintiff”) and Defendants Biomet Orthopedics, LLC and Biomet, Inc. (“Biomet” or “Defendants”) hereby submit, through the undersigned, the following Stipulation To Transfer Venue to the Western District of Virginia.¹

On July 17, 2012, Plaintiff filed her complaint in the above-titled action in the United States District Court, Northern District of California, alleging injuries caused by an M²a-Magnum Hip Implant System sold by Biomet. On September 7, 2012, Defendants filed a Motion to Transfer Venue to the Western District of Virginia. Plaintiff is a resident of Virginia and received medical care related to her alleged hip replacement in Virginia. Based on the forgoing, the parties agree that the Western District of Virginia is the appropriate venue for the above-titled action.

IT IS THEREFORE STIPULATED AND AGREED by and among Plaintiffs and Defendants through the undersigned, to transfer the above-titled action to the Western District of Virginia.

DATED: September 26, 2012.

REED SMITH LLP

By /s/ Steven J. Boranian
Steven J. Boranian (SBN 174183)
Attorneys for Biomet Orthopedics, LLC, Biomet,
Inc., and Biomet, LLC

PANISH SHEA & BOYLE LLP

By /s/ Peter Kaufman
Peter Kaufman (SBN 269297)
Attorneys for Plaintiff Delores Clark

**Filer’s Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Steven J. Boranian hereby attests that concurrence in the filing of this document has been obtained.*

¹ Plaintiff’s Complaint also names Biomet, LLC as a defendant, but there is no legal entity known as Biomet, LLC.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 DATED: 9/26, 2012



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5 HONORABLE SUSAN ILLSTON
6 UNITED STATES DISTRICT COURT JUDGE
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